

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

WESTPORT INSURANCE  
CORPORATION,

Plaintiff

Case No. 1:05 CV 11780 DPW

V.

RICHARD C. HEIDLAGE; KOTIN,  
CRABTREE AND STRONG, LLP;  
CHARLES N. ZALIS; and NORTH  
AMERICAN UNDERWRITING  
MANAGERS, INC.,

Defendants.

**MOTION TO APPEAR PRO HAC VICE**

The plaintiff, Westport Insurance Corporation (“Westport”), by its attorney, Steven J. Bolotin of Morrison Mahoney LLP, respectfully moves that attorney, George J. Manos, of the Bar of the State of Illinois, be admitted to practice, before the Bar of the United States District Court for the District of Massachusetts, *pro hac vice*. In support hereof, Westport states as follows:

1. Attorney Manos represents Westport nationally.
2. Westport desires to have Attorney Manos participate as trial counsel in this matter.
3. Attorney Manos is a licensed attorney in good standing in all of the courts before which he is admitted. (See Affidavit of George J. Manos, Esq., attached hereto as Exhibit A.)
4. Attorney Manos has been admitted *pro hac vice* before the United States District Court for the District of Massachusetts.
5. The undersigned counsel will remain actively associated with Attorney Manos in the defense of this matter.

Wherefore, it is respectfully requested that the motion to admit Attorney Manos to this Court *pro hac vice* be allowed.

For the Plaintiff,

Westport Insurance Corporation

/s/sbolotin

Steven J. Bolotin, BBO#564085  
MORRISON, MAHONEY & MILLER, LLP  
250 Summer Street  
Boston, MA 02210  
(617) 439-7500

Dated: January 25, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to non registered participants on January 25, 2007.

/s/sbolotin

Steven J. Bolotin

# **EXHIBIT A**

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**AFFIDAVIT IN SUPPORT OF  
MOTION TO APPEAR PRO HAC VICE**

Under oath, I depose and state the following:

1. My name is George J. Manos.


2. I am an attorney admitted to practice before the state of courts of Illinois, 1986; U.S.D.C., Northern District of Illinois, 1986; U.S. Court of Appeals, Third Circuit, 1996; U.S. Court of Appeals, Eleventh Circuit, 1996; U.S.D.C., District of Colorado, 1999; U.S.D.C., Central District of Illinois, 2000; U.S.D.C., Eastern District of Wisconsin, 2000; U.S.D.C., Western District of Wisconsin, 2001; U.S.D.C., District of Nebraska, 2001; U.S.D.C., Southern District of Illinois, 2001; U.S. Court of Appeals, Seventh Circuit, 2002; U.S. Court of Appeals, Fifth Circuit, 2004; U.S.D.C., Western District of Michigan, 2005.

3. I am presently a member in good standing with each of these state and federal bars.

4. I have been associated with the firm of Bollinger, Ruberry & Garvey since 1991.

WHEREFORE, I respectfully request that my motion to be admitted *pro hac vice* for the purposes of this case be allowed.

Signed under the pains and penalties of perjury the 25<sup>TH</sup> day of January, 2007.

  
George J. Mandis